

million (down from its previous estimate of \$1.8 million).³⁷ This estimate shares the same infirmities as its earlier estimate (see, Sprint Comments at 54). It continues to include costs that would have to be incurred even with 10-digit screening, such as card honoring agreements to allow IXC billing of LEC handled intraLATA calls charged to IXC-issued cards in cases where the customers opts for such a card instead of a LEC-issued card, and to assume that it would have to accommodate as many as 20 different PINS each for up to 19 different IXCs. Southwestern Bell concedes (Attachment B, n. 23) that the latter assumption was not realistic and that the added costs of 14-digit screening could be cut in half if it only had to accommodate 20 PINS for each of three card issuers (i.e., \$126.8 million compared with \$118.9 million without 14-digit screening). Even with that adjustment, Southwestern Bell's estimate is so far above that of the other large LECs - - none of whom favor 14-digit screening -- that Sprint believes its figures are still highly suspect. Assuming (as it appears reasonable to do) that the more modest estimates of the other LECs are closer to the mark, the non-recurring charges for each large LEC appear to be only in the range of \$2.6 - 5 million, which is quite small in relation to the public benefits involved and the other costs of implementing BPP.

³⁷ Compare SWB Attachment B (Implementation Costs With 14-digit Screening), with Attachment A (Implementation Costs Without 14-digit Screening) Its previous estimates were shown in Attachment A to an ex parte letter dated December 8, 1993.

2. Participation of Smaller Carriers In BPP

In Sprint's initial comments (at 46-49), Sprint explained how smaller IXCs could fully participate in the benefits of billed party preference by using a secondary PIC to handle calls originating in areas they do not serve, and why, in order to fulfill this competitive objective, the primary 0+ PIC (instead of the consumer) should be allowed to select the secondary carrier. Capital Network System argues (at 13) that it is unreasonable to believe that either large nationwide carriers or smaller regional carriers would be willing to enter into reasonable relationships to serve as the secondary OSP. CNS's assumption is simply unfounded. There is vigorous competition today among facilities-based carriers -- both large carriers such as Sprint, AT&T and MCI, and medium-sized carriers such as WilTel -- to meet the needs of small regional IXCs. Sprint provides a variety of services, including branded operator services, to smaller carriers even though it competes with such carriers on the retail level. Indeed, the very existence of small IXCs depends on ability to get transmission and other services from larger carriers at reasonable prices. CNS's assumption that this would no longer be the case if BPP were implemented is unsupported and entitled to no credence whatsoever.

3. Balloting vs. Customer Notification for Selection of Primary 0+ PIC

Sprint's initial comments also addressed (at 43-46) why a simple customer notification procedure, rather than any form

of balloting, should be employed when BPP is implemented. Under the notification option, consumers would simply be informed that they have the right to select a different 0+ PIC than their 1+ PIC, and they would be defaulted to their 1+ PIC unless or until they exercised that option. Sprint explained that this would be less confusing and far less expensive to implement than the balloting procedure proposed by the Commission or the type of full-scale balloting and allocation that accompanied 1+ equal access.

While not all LECs identified their balloting costs, those that did bear out Sprint's belief that such costs are substantial. Ameritech estimates its costs for balloting would amount to \$15.6 million (Attachment A); BellSouth's estimate is \$4.4 million (Appendix A); NYNEX's is \$4.1 million (Attachment C-1, p. 1); and Southwestern Bell estimates its costs at \$6 million (Attachment A). GTE, which seems to interpret the Commission's proposal as merely requiring a mail insert rather than a ballot to be returned, at GTE's expense, by the customer (see, GTE's Comments at 16), estimates its costs at only \$1.6 million (Attachment A). And as detailed in Sprint's initial comments, the Sprint LECs estimate that the form of balloting proposed by the Commission would cost \$5.1 million, while simple notification would reduce those costs to \$0.1 million. In short, a formal ballot not only creates the possibilities of customer confusion that Sprint discussed in its initial comments, but it is expensive to administer as well.

Capital Network System argues (at 15) that the Commission's proposal to default customers who don't return their ballots to their 1+ carrier (or, if the customer notification option is selected, default all customers to their 1+ carrier until they affirmatively chose a different 0+ PIC) is inconsistent with the Commission's findings, in AT&T's Private Payphone Commission Plan,³⁸ that the 1+ and 0+ markets are distinct. CNS misapplies the context of that case to a BPP environment. There, the Bureau prohibited AT&T from tying the payment of commissions on 0+ calls to a requirement that it must also be given all of the private payphone company's 1+ traffic. The reason the Bureau viewed the 0+ and 1+ services as "distinct" in considering the lawfulness of this tying arrangement was because they have separate customers: the private payphone company is the customer for 1+ calls and the end-user is the customer for 0+ calls (see, ¶25 at 5837). Under billed party preference, the end-user is the customer in both instances: The 1+ calls made by the customer from his or her home or business would be billed to that customer's home or business telephone account, and 0+ calls for which the customer pays (LEC calling card calls, collect calls, etc.) will also be billed to that number. The 0+ plus carrier will no longer be determined by someone other than the party paying for the call, as was the case in the AT&T Private Payphone decision.

³⁸ 3 FCC Rcd 5834, 5837 (CCB 1988).

It is likely that the overwhelming majority of consumers will want to receive 0+ services from their 1+ carrier (as evidenced by the claims that dial-around traffic has increased so greatly in recent years). Thus, default of 0+ PICs to the 1+ PIC -- unless or until the consumer affirmatively chooses a different 0+ PIC -- will satisfy the needs and desires of most consumers and will minimize the consumer confusion and opportunity for overcharges that might ensue from forced allocation of customers' 0+ PICs as CNS seeks (n.37 at 16).³⁹

F. Advanced Service Features

AT&T argues (at 24) that BPP would limit service enhancements on 0+ calls to those that can be accommodated within the context of BPP. However, the only example cited by AT&T is voice-activated dialing. Sprint pioneered the voice-activated calling card and is the only carrier offering such a card today. Sprint recognizes that such a card is inherently incompatible with 0+ dialing and that, in a BPP environment, users of its voice-activated card will have to continue to dial an access code as they do now. However, it believes that the enhanced features of this card are sufficiently attractive that some consumers will be willing to do so. That should not preclude Sprint from being able to also offer its consumers a conventional calling card that can be used with the same 0+ dialing convenience that AT&T can now offer its customers.

³⁹ Given their present pricing practices, Sprint would not be surprised if at least some alternative OSPs attempted to remain in business simply by charging high rates to customers who were allocated to them.

The fact that BPP cannot do everything is no reason for declining to adopt it for benefits that it can bring to consumers.

G. Cost Recovery

There is considerable difference of opinion in the initial comments as to the optimum method for recovery of the LECs' BPP implementation costs. However, as discussed in Sprint's initial comments (at 42-43), this is an issue the Commission does not need to decide at this time. The length of time needed to deploy BPP (estimated by various parties to range from 2-1/2 to 3 years) is more than sufficient to permit resolution of that issue in a more focused proceeding closer to the date of implementation. However, Sprint perceives that a principal reason why some LECs oppose BPP is a concern that they will not be allowed to fully recover their costs of implementing BPP. The Commission should make clear in ordering BPP that this concern is unfounded and that all LECs will have an opportunity to recover their reasonable costs of deploying billed party preference.

IV. CONCLUSION

The public interest clearly favors the adoption of billed party preference. Nonetheless, there are a number of convergent, yet different interests that have resulted in an unusual alliance against billed party preference. First there are the alternative operator service providers. These companies are only a small portion of the telecommunications industry, but they have been extremely vocal (as might be

expected) in seeking to protect their present way of doing business. These OSPs would have a difficult time in a BPP environment because of the very public interest factors that warrant adoption of BPP: it is not easy to continue to charge the public as much as four or five times what others are charging if the parties paying for the call are in a position to select the carrier that completes the call. Naturally, many premises owners that profit from the status quo also share the interests of the alternative OSPs.

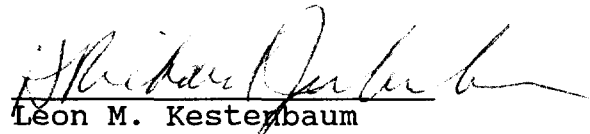
On the other end of the spectrum is AT&T, which is once again against a measure that would further erode its pre-divestiture monopoly market endowment, just as it previously opposed 800 number portability. AT&T has extremely important advantages in the operator services market -- similar to its advantage in the 800 market before number portability -- which it has used to stymie competition, both in operator services and in the broader 1+ market as well. Notwithstanding its arguments to the contrary, AT&T is well aware of the importance of these advantages. It has sought to downplay those advantages simply as a means of preserving them.

The interests of the RBOCs that oppose billed party preference are more varied and not as self-evident as those of the alternative OSPs and AT&T. But Sprint believes a large part of their concerns stem from a fear that they will be forced to absorb some portion of the costs of implementing this endeavor.

Notwithstanding all of these differing interests and the efforts of these parties to create a tide against BPP, the public interest is not difficult to discern here. This is not a close case. Adopting BPP is the right thing to do for the sake of the consumers, and for the sake of creating a level competitive playing field in the long distance market that serves, rather than abuses, the public interest.

Respectfully submitted,

SPRINT CORPORATION

A handwritten signature in dark ink, appearing to read "H. Richard Juhnke", is written over a horizontal line.

Leon M. Kestenbaum

Jay Keithley

H. Richard Juhnke

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(202) 857-1030

September 14, 1994

All Calls

DATE	*	ORIGINATING CITY	PHONE NUMBER	CARRIER	QUOTE	ACTUAL	TYPE OF CALL	# OF MIN	RANGE	OA/TT
26-Jul		Cumming, GA	404-887-9267	Amnex	\$11.11	\$10.95	Collect	8	E	TT
25-Jul		Roswell, GA	404-998-9688	Centron	\$9.51	\$9.51	Collect	8	D	OA
25-Jul		Roswell, GA	404-998-9688	Centron		\$5.58	Credit Card	3	D	
25-Jul		Roswell, GA	404-998-9688	Centron	\$6.88	\$9.51	Credit Card	8	D	TT
25-Jul		Alpharetta, GA	404-475-9022	Conquest	\$5.67	\$6.92	Collect	8	E	TT
25-Jul		Alpharetta, GA	404-475-9027	Conquest	\$4.67	\$6.92	Collect	8	E	TT
25-Jul		Roswell, GA	404-993-9262	Conquest Oper. Sys.		\$6.23	Credit Card	8	D	
25-Jul		Alpharetta, GA	404-475-9022	Conquest Oper. Sys.	\$4.98	\$6.23	Credit Card	8	E	OA
25-Jul		Alpharetta, GA	404-475-9027	Conquest Oper. Sys.	\$4.98	\$6.23	Credit Card	8	E	OA
25-Jul		Roswell, GA	404-992-9349	CPS	\$8.72	\$10.54	Collect	9	D	OA
26-Jul		Dawsonville, GA	706-216-3024	CPS	\$7.36	\$7.78	Collect	9	D	OA
26-Jul		Dawsonville, GA	706-216-3023	CPS	\$7.33	\$8.20	Collect	10	D	OA
26-Jul		Roswell, GA	404-642-9403	CPS	\$9.98	\$11.10	Collect	10	E	TT
26-Jul		Cumming, GA	404-781-8056	CPS	\$9.98	\$11.10	Collect	10	E	TT
25-Jul		Roswell, GA	404-992-9349	CPS	\$9.98	\$12.78	Credit Card	13	D	TT
26-Jul		Dawsonville, GA	706-216-1049	CPS		\$8.20	Credit Card	10	D	
26-Jul		Dawsonville, GA	706-216-3024	CPS	\$7.36	\$8.20	Credit Card	10	D	TT
26-Jul		Dawsonville, GA	706-216-3023	CPS	\$5.87	\$6.28	Credit Card	9	D	TT
26-Jul		Roswell, GA	404-642-9403	CPS	\$9.98	\$11.10	Credit Card	10	E	OA
26-Jul		Cumming, GA	404-781-8056	CPS	\$9.98	\$11.10	Credit Card	10	E	OA
26-Jun		Elmhurst, IL	708-834-8136	Express Telephone	\$7.09	\$5.08	Collect	8	N/W	OA
17-Jul		Elmhurst, IL	708-834-8136	Express Telephone		\$5.08	Collect	8	D	OA
17-Jul		Elmhurst, IL	708-832-3572	Express Telephone		\$5.08	Collect	8	D	
17-Jul		Elmhurst, IL	708-834-8136	Express Telephone		\$4.83	Credit Card	8	N/W	TT
17-Jul		Elmhurst, IL	708-832-3572	Express Telephone		\$4.83	Credit Card	8	N/W	
19-Jul		Elmhurst, IL	708-832-3572	Express Telephone		\$6.88	Credit Card	8	D	
20-Jul		Glendale, AZ	602-931-0970	GCB Comm. Inc.		\$5.53	Credit Card	8	D	OA
21-Jul		Glendale, AZ	602-931-0970	GCB Comm. Inc.		\$5.53	Credit Card	8	E	OA
20-Jul		Glendale, AZ	602-931-0970	GCB Comm., Inc.		\$6.83	Collect	8	D	TT
21-Jul		Glendale, AZ	602-931-0970	GCB Comm., Inc.		\$6.37	Collect	7	E	
20-Jul		Glendale, AZ	602-846-5079	Integretel		\$7.97	Collect	9	D	
21-Jul		Glendale, AZ	602-846-5079	Integretel		\$8.97	Collect	9	E	
17-Jul		Glendale, AZ	602-435-8052	International Pacific	\$8.94	\$8.94	Collect	8	N/W	OA
20-Jul		Glendale, AZ	602-435-8052	International Pacific	\$5.22	\$8.94	Collect	8	E	TT
17-Jul		Glendale, AZ	602-435-8052	International Pacific		\$8.94	Credit Card	8	N/W	

All Calls

DATE	*	ORIGINATING CITY	PHONE NUMBER	CARRIER	QUOTE	ACTUAL	TYPE OF CALL	# OF MIN	RANGE	OA/TT
20-Jul		Glendale, AZ	602-435-8052	International Pacific	\$5.75	\$6.99	Credit Card	8	D	TT
21-Jul		Glendale, AZ	602-435-8052	International Pacific	\$5.75	\$6.99	Credit Card	8	E	TT
22-Jul		Los Angeles, CA	213-564-8457	ITC	\$8.05	\$8.05	Collect	8	D	TT
22-Jul		Los Angeles, CA	213-564-8457	ITC Tele Services		\$8.05	Credit Card	8	D	
22-Jul		Los Angeles, CA	213-564-8457	ITC Tele Services	\$8.05	\$8.05	Credit Card	8	E	OA
26-Jun		Elmhurst, IL	708-530-9625	LDDS	\$3.12	\$2.02	Collect	9	N/W	OA
19-Jul		Elmhurst, IL	708-530-9625	LDDS Metromedia	\$4.86	\$5.37	Collect	9	E	OA
17-Jul		Elmhurst, IL	708-530-9831	LDDS Metromedia		\$6.36	Collect	9	N/W	OA
19-Jul		Elmhurst, IL	708-530-9831	LDDS Metromedia		\$7.99	Collect	11	D	OA
17-Jul		Elmhurst, IL	708-530-9625	LDDS Metromedia	\$1.80	\$5.10	Credit Card	9	N/W	OA
19-Jul		Elmhurst, IL	708-530-9625	LDDS Metromedia	\$3.12	\$6.19	Credit Card	8	D	TT
19-Jul		Elmhurst, IL	708-530-9625	LDDS Metromedia	\$2.04	\$5.11	Credit Card	8	E	TT
17-Jul		Elmhurst, IL	708-530-9831	LDDS Metromedia		\$6.36	Credit Card	9	N/W	TT
19-Jul		Elmhurst, IL	708-530-9831	LDDS Metromedia		\$6.36	Credit Card	9	D	
19-Jul		Elmhurst, IL	708-530-9831	LDDS Metromedia		\$4.49	Credit Card	3	D	TT
26-Jul		Cumming, GA	404-887-9267	O.A.N. Services, Inc.	\$9.41	\$9.25	Credit Card	8	E	OA
25-Jul		Roswell, GA	404-594-9073	OAN Services, Inc.		\$6.17	Collect	8	D	
17-Jul		Elmhurst, IL	708-834-0172	Oncor	\$11.60	\$12.52	Collect	9	N/W	TT
19-Jul		Elmhurst, IL	708-834-0056	Oncor	\$11.60	\$12.52	Collect	9	D	TT
19-Jul		Elmhurst, IL	708-530-9578	Oncor	\$7.43	\$8.04	Collect	9	D	TT
19-Jul		Elmhurst, IL	708-834-0172	Oncor	\$16.63	\$12.52	Collect	9	E	OA
19-Jul		Elmhurst, IL	708-834-0056	Oncor	\$16.65	\$12.52	Collect	9	E	OA
26-Jun		Elmhurst, IL	708-834-0172	Oncor	\$12.85	\$12.52	Collect	9	N/W	TT
26-Jun		Elmhurst, IL	708-530-9578	Oncor	\$7.43	\$8.04	Collect	9	N/W	TT
19-Jul		Elmhurst, IL	708-530-9389	Oncor	\$16.88	\$19.51	Collect	11	E	TT
19-Jul		Elmhurst, IL	708-782-2028	Oncor		\$15.38	Collect	10	E	TT
17-Jul		Elmhurst, IL	708-834-0172	OnCor	\$12.85	\$12.52	Credit Card	9	N/W	OA
17-Jul		Elmhurst, IL	708-530-9578	OnCor		\$8.04	Credit Card	9	N/W	
19-Jul		Elmhurst, IL	708-834-0056	OnCor	\$12.86	\$12.52	Credit Card	9	D	OA
19-Jul		Elmhurst, IL	708-530-9578	OnCor	\$7.73	\$8.04	Credit Card	9	D	OA
19-Jul		Elmhurst, IL	708-834-0172	OnCor	\$11.60	\$12.52	Credit Card	9	D	TT
19-Jul		Elmhurst, IL	708-834-0056	OnCor	\$11.60	\$12.52	Credit Card	9	E	TT
19-Jul		Elmhurst, IL	708-530-9389	OnCor		\$18.16	Credit Card	9	E	OA
19-Jul		Elmhurst, IL	708-782-2028	OnCor		\$14.17	Credit Card	9	E	OA
22-Jul		Los Angeles, CA	213-566-9223	Opticom	\$8.00	\$11.72	Collect	9	E	TT

All Calls

DATE	*	ORIGINATING CITY	PHONE NUMBER	CARRIER	QUOTE	ACTUAL	TYPE OF CALL	# OF MIN	RANGE	OA/TT
26-Jul		Cumming, GA	404-889-9034	Opticom	\$11.85	\$11.17	Collect	9	E	TT
7-Aug		Apopka, FL	407-884-7828	Opticom	\$6.80	\$9.75	Collect	9	N/W	OA
10-Aug		Apopka, FL	407-884-7828	Opticom	\$6.80	\$9.75	Collect	9	D	OA
19-Jul		Elmhurst, IL	708-834-8133	Opticom		\$12.06	Credit Card	9	D	OA
22-Jul		Los Angeles, CA	213-566-9223	Opticom	\$7.76	\$11.72	Credit Card	9	D	OA
22-Jul		Los Angeles, CA	213-566-9223	Opticom	\$7.76	\$11.72	Credit Card	9	E	OA
26-Jul		Cumming, GA	404-889-9034	Opticom	\$11.85	\$11.17	Credit Card	9	E	OA
7-Aug		Apopka, FL	407-884-7828	Opticom	\$6.80	\$9.75	Credit Card	9	N/W	TT
10-Aug		Apopka, FL	407-884-7828	Opticom	\$6.80	\$9.75	Credit Card	9	D	TT
7-Aug		Winterpark, FL	407-682-6139	PTC	\$6.58	\$7.87	Collect	9	N/W	TT
7-Aug		Winterpark, FL	407-682-6135	PTC		\$7.87	Collect	9	N/W	
8-Aug		Winterpark, FL	407-682-6136	PTC	\$6.58	\$8.48	Collect	8	D	OA
8-Aug		Winterpark, FL	407-682-6139	PTC	\$6.58	\$7.87	Collect	7	E	TT
8-Aug		Winterpark, FL	407-682-6135	PTC		\$6.87	Collect	9	E	
10-Aug		Winterpark, FL	407-682-6136	PTC	\$4.08	\$7.99	Collect	7	D	OA
7-Aug		Winterpark, FL	407-682-6136	PTC	\$5.83	\$8.48	Credit Card	8	N/W	TT
7-Aug		Winterpark, FL	407-682-6139	PTC		\$8.48	Credit Card	8	N/W	
7-Aug		Winterpark, FL	407-682-6135	PTC		\$8.48	Credit Card	8	N/W	
8-Aug		Winterpark, FL	407-682-6136	PTC		\$7.73	Credit Card	8	E	
8-Aug		Winterpark, FL	407-682-6139	PTC		\$8.48	Credit Card	8	E	
8-Aug		Winterpark, FL	407-682-6135	PTC		\$8.48	Credit Card	8	E	
10-Aug		Winterpark, FL	407-682-6136	PTC	\$4.08	\$7.73	Credit Card	8	D	TT
17-Jul		Glendale, AZ	602-846-5079	Sharenet Comm.		\$7.87	Credit Card	9	N/W	TT
20-Jul		Glendale, AZ	602-846-5079	Sharenet Comm.		\$7.87	Credit Card	9	D	TT
21-Jul		Glendale, AZ	602-846-5079	Sharenet Comm.		\$7.87	Credit Card	9	E	TT
25-Jul		Roswell, GA	404-993-9121	TelecomUSA	\$4.21	\$5.13	Collect	8	D	OA
25-Jul		Roswell, GA	404-993-9231	TelecomUSA	\$4.21	\$5.13	Collect	8	D	OA
25-Jul		Roswell, GA	404-993-9121	TelecomUSA	\$2.94	\$3.88	Credit Card	8	D	TT
25-Jul		Roswell, GA	404-993-9231	TelecomUSA	\$2.95	\$3.88	Credit Card	8	D	TT
25-Jul		Roswell, GA	404-594-9073	Teleleasing	\$1.87	\$11.89	Credit Card	7	D	OA
19-Jul		Elmhurst, IL	708-833-6379	Televox		\$12.00	Collect	13	E	TT
19-Jul		Elmhurst, IL	708-833-6379	Televox		\$11.50	Credit Card	13	E	OA
20-Jul		Glendale, AZ	602-934-7699	Teltrust		\$8.25	Collect	8	N/W	
21-Jul		Glendale, AZ	602-934-7699	Teltrust		\$8.25	Collect	8	E	
22-Jul		Downey, CA	310-861-0484	Teltrust	\$8.50	\$6.02	Collect	8	D	OA

All Calls

DATE	*	ORIGINATING CITY	PHONE NUMBER	CARRIER	QUOTE	ACTUAL	TYPE OF CALL	# OF MIN	RANGE	OA/TT
22-Jul		Los Angeles, CA	213-567-6068	Teltrust		\$9.57	Collect	8	D	
22-Jul		Downey, CA	310-861-0484	Teltrust	\$8.50	\$5.30	Collect	8	E	TT
22-Jul		Los Angeles, CA	213-567-6068	Teltrust		\$9.57	Collect	8	E	
17-Jul		Glendale, AZ	602-934-7699	Teltrust		\$8.25	Collect	8	N/W	TT
17-Jul		Glendale, AZ	602-934-7699	Teltrust	\$8.25	\$8.25	Credit Card	8	N/W	TT
20-Jul		Glendale, AZ	602-934-7699	Teltrust		\$8.25	Credit Card	8	D	OA
21-Jul		Glendale, AZ	602-934-7699	Teltrust	\$2.40	\$8.25	Credit Card	8	E	OA
22-Jul		Downey, CA	310-861-0484	Teltrust	\$8.00	\$6.02	Credit Card	8	D	TT
22-Jul		Los Angeles, CA	213-567-6068	Teltrust		\$9.57	Credit Card	8	D	
22-Jul		Downey, Ca	310-861-0484	Teltrust	\$8.00	\$5.30	Credit Card	8	E	OA
22-Jul		Los Angeles, CA	213-567-6068	Teltrust		\$9.57	Credit Card	8	E	
20-Jul		Glendale, AZ	602-930-9481	Unitec		\$9.66	Collect	9	D	
21-Jul		Glendale, AZ	602-930-9481	Unitec		\$9.66	Collect	9	E	
17-Jul		Glendale, AZ	602-930-9481	Unitec		\$9.31	Credit Card	9	N/W	
20-Jul		Glendale, AZ	602-930-9481	Unitec		\$6.12	Credit Card	3	D	
20-Jul		Glendale, AZ	602-930-9481	Unitec		\$9.66	Credit Card	9	D	
21-Jul		Glendale, AZ	602-930-9481	Unitec		\$9.66	Credit Card	9	E	
24-Jul		Alpharetta, GA	404-664-1008	US Long Distance		\$7.53	Credit Card	9	N/W	

DETROIT FREE PRESS AUG 18 1994

Attorney general tells firms to cut long-distance prices

BY HIAWATHA BRAY *2/3*
Free Press Business Writer

Diane Thomas of Lansing thought \$8.65 was too much to pay for a two-minute phone call, so she complained to Michigan Attorney General Frank Kelley.

She wasn't alone. About 125 people have contacted the attorney general's office in the past two years with similar complaints. Many Michigan pay phones are served by long-distance companies that charge high rates for collect and calling card calls.

On Wednesday, Kelley warned eight of those companies that if they don't cut their prices, he'll take them to court. He gave the companies 10 days to set up negotiations with him. If they don't, Kelley said, he'd file suit to shut the companies down.

The companies cited by Kelley include Oncor Communications, U.S. Long Distance, Annex, Value-Added Communications, Capital Network System, CTS Communication, Ushac and Opticom.

Kelley also threatened action against two firms that prepare the bills for long-distance phone companies — Zero Plus Dialing and Operator Assistance Network.

"These companies sometimes charge up to 800 percent more than the normal charge," said Kelley. The state's telecommunications law lets long-distance companies charge whatever they want. But Kelley said Michigan's Consumer Protection Act can be used to bring an end to the "grossly excessive rates" charged by some

would have cost 87 cents if it had been placed through Ameritech. CTS charged her \$8.65. "When I got the bill, I was unpleasantly surprised," Thomas recalled. "It was outrageous."

Rick Lipoff, an attorney for CTS, says the company has a right to charge whatever it can. "The American system is that companies should be free to compete and charge the price that the market will warrant," Lipoff said. CTS contacted state telephone regulators last year, before it began doing business in Michigan. "We were told there are no rate caps in Michigan," he said.

Kelley agrees, and he called for passage of a law that would limit the cost of long-distance calls.

Kelley also complained that many consumers don't know which long-distance company they're using. Under federal law, pay phones or hotel room phones are supposed to display the name of the long-distance company that serves the phone. That company will handle all calling card calls made on the phone, even if the calls are made with a card from AT&T or Sprint.

Consumers have a loophole. By dialing a special access code, anybody can reach his or her own long-distance carrier.

But Kelley said many phones don't carry these signs, so callers don't know what they're getting until it's too late. He said that is the responsibility of pay phone companies and hotel owners, but added that for now he intends to concentrate on the long-distance carriers.

See LONG-DISTANCE, Page 2E

companies.

Diane Thomas thinks CTS's rates are excessive. Thomas, a travel agent for AAA Michigan, used her calling card to make a local call that lasted two minutes. She didn't realize that the pay phone routed all calling card calls through CTS.

If she had had change, the call would have cost Thomas a quarter. Even with the calling card, the call

DETROIT FREE PRESS

SEP 09 1984

YOUR MONEY ^{E3}

Caller gets bad connection with long-distance carrier

How would you feel if you had made \$47.50 worth of phone calls and received a bill for \$244.81?

Leighanne Chesney's reaction to the phone bill started with hysteria and cooled down to cold fury. She is filing charges with the Federal Communications Commission, the Michigan Attorney General and the Detroit Consumer Affairs Department. And she has no intention of paying more than \$27.50.

In July, Chesney took a 10-day vacation in St. Augustine, Fla., leaving behind a boyfriend, a car and five pets. Out of concern for all of them, she called home several times to check on their welfare. The calls were usually brief. Sometimes she reached an answering machine and hung up quickly.

Her vacation residence was a trailer park, and the only pay phones available were linked to a long-distance company called ONCOR.

When she tried to use her AT&T calling card, she got nothing but a series of clicks and noises and then was cut off. There were only three phones and lines of people waiting, so she gave up and placed the calls through ONCOR. "Mysteriously," she said, "it never disconnected me!"

The bill that followed her home charged \$8.34 for a two-minute call made in the afternoon, \$7.06 for a one-minute call at 9 a.m. Chesney

got a list of AT&T rates and a calculator, and figured what the charges should have been: 27 cents per minute. A fair-minded person, she totaled the amount she should have owed had she been able to use her AT&T card, added the correct amount for tax and offered to pay ONCOR what she felt was due: \$27.50. Not one cent more.

As I have indicated several times in this column, she need not pay anything at all. ONCOR is not a regulated long-distance service, and her Michigan phone cannot be disconnected if she refuses to pay that portion of her bill.

If you are wondering why I keep nagging about phone bills such as Chesney's, it's because here is just one of the many complaints I have received. All of them vent their anger at the many long-distance companies. That's not enough. Chesney's trailer park operator, the owners of the bars, restaurants and hotels that also rent those compe-

~~~~~  
**Esther Shapiro**



nies, are equally the villains.

When Ma Bell was deregulated 10 years ago, the motive was pure. Monopolies can be dangerous; competition is good for the consumer soul. The concept was to break the barrier that kept small companies out of the phone business and open the lines to anyone.

And I do mean anyone. A recent ad in this paper offered to lease pay phones for \$39.95 per month. The owner of an establishment open to public traffic can lease phones, and then link the service to an independent company that offers to split the charges with the business owner. Given the rates they charge, they can promise a generous return. An area with a heavy flow of transient users, like an airport or a hotel lobby, can put aside the wrath of a few consumers, whom they will probably never see again, and enjoy the profits.

I discussed the problem with Steve Fowl, director of external rela-

tions with Ameritech's pay phone service. His advice:

"There are many pay phone companies and operator services with whom we compete today, many of whom charge rates that are very different from ours. We encourage consumers, when they are on the go, to look and listen for the Ameritech name when they make their calls, so they can be assured of the best service and fairest prices."

Consumers traveling outside the Ameritech area should be equally careful to make sure they are connected with a long-distance carrier of their choice, whether it be AT&T, MCI, Sprint or any other competitively priced company. Ask the operator what company will place the call, at what rate.

Making a long-distance phone call is like any other consumer purchase. You have to know the merchant and the price before you make your buy.

WEDNESDAY, SEPTEMBER 7, 1994

## District Says Bethesda Firm Violated Pay Phone Contract

By Charles R. Babcock and Joan Shaffer

Washington Post Staff Writers

The District is canceling a contract for long-distance service on more than 1,100 pay phones in city buildings and prisons and on street corners after being informed the current carrier has been charging some consumers up to five times as much as the previous one, according to a city official.

Monica Wilkerson, deputy director of the city's Department of Administrative Services, said the agreement with Oncor Communications Inc. of Bethesda and

its agent will be ended in mid-September. She said officials found, after inquiries from The Washington Post and through research, that Oncor had breached the contract.

The termination letter, addressed to the agent, Accent Marketing, of Richmond, said the contractor failed "to reimburse the District the contractually agreed commission rate." It said Accent and Oncor tried to unilaterally lower the agreed-on commission rate on some calls and was not providing service to 154 phones covered by the contract.

Officials for Accent and Oncor did not return phone calls yesterday.

The city will now have to seek a contract with another provider, but phone service will not be interrupted in the meantime.

The District switched to Oncor from Sprint in January, without competitive bidding and over the objection of a senior official of the Department of Administrative Services. Agency Director Bruce A. Marshall said in an interview in early August—before the cancellation letter was sent—that the change was made to earn more revenue for the District. He could produce no documentation, however, that commissions from Oncor would produce more money than Sprint had.

The handling of the pay phone contract is an example of problems in the city's contracting practices. As a mayoral candidate four years ago, Sharon Pratt Kelly pledged she would "overhaul contract procurement and compliance."

But annual reports by the city's inspector general con-

See PHONES, D2, Col. 3

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*Courtland Milloy is away. His column will resume when he returns.*



# The Washington Post

tinue to point out the same problems. "As has been the case over the last eight years, the same deficiencies continue to be noted, including the excess use of emergency and sole source procurements . . . and the lack of adequate planning, administration and monitoring," Samuel McClendon, the inspector general, said in the latest report.

Pay phone contracts produce substantial revenue for many cities, airports and prison systems. This is because providers compete to pay commissions to get the business on high-volume phones. The Metropolitan Washington Airports Authority received \$4.8 million from AT&T last year from 1,000 pay phones at National and Dulles, while the Virginia prison system collected \$3 million from District-based MCI Communications, spokesmen said.

Nearly 700 of the city's pay phones are at the D.C. jail and Lorton prisons, where usage is high. Inmates must place collect calls, local or long distance, and cannot use any long-distance carrier except Oncor. Most of the calls are local, but families and friends of some prisoners found their bills for long-distance collect calls jumped dramatically.

For example, the charge for a 10-minute collect call from the jail to California cost \$3.95 in December, when Sprint was the carrier, according to one bill. An 11-minute call to the same number at the same time of day cost \$19.64 in February, when Oncor was the carrier. Oncor charges from the jail to other customers in Arlington and Idaho were also much higher than Sprint charged.

"It is outrageous for the city to be raising money from these high charges to the families of inmates," said Jonathan Smith, director of the D.C. Prisoners Legal Services Project.

Oncor has been in trouble with regulators in the past. In 1992, while it was still using the name International Telecharge Inc., it was fined \$250,000 by Florida regulators for overcharging inmate families and agreed to refund \$750,000.

Marshall said that his contracting officer, Linda R. Reed, picked Oncor over Sprint and AT&T in January because its offer to pay \$1.40 for every long-distance call seemed to provide the most money for the city. The city didn't seek competitive proposals from other vendors because it was in a hurry to increase revenue because of the budget crisis, he said.

Marshall said the contract paperwork was "lousy." The file didn't contain the proposals of any of the potential vendors, as it should have, or the required written evaluation that was the basis for choosing Oncor.

He said he found in his own files a September 1993 letter from Accent's Beatrice Carey. The letter, which also was sent to Mayor Kelly, said the city could double its long-distance commission revenue to \$22,000 a month by switching from Sprint. Marshall said Oncor paid the city \$12,316 in commissions on inmate phones for April.

Marshall said the decision to contract with Accent and Oncor was made with no input from the mayor or other city offices.

The Bethesda firm was in the running, he added, because it already had a city contract, with D.C. General Hospital. The terms of that 1993 agreement are quite different, however. The hospital receives 20 percent of Oncor's revenue on each operator-assisted call and sets no limit on how much Oncor can charge consumers.

Marshall said that in an effort to protect pay telephone users, the citywide contract was amended to set Oncor's maximum rate at 60 cents a minute. That is about double the maximum rates of AT&T, Sprint and MCI, the major long-distance companies. He said he understood the rate limit would include all of Oncor's charges. "The relevant issue was could we maximize income without gouging people."

Oncor's rate filing at the Federal Communications Commission says it may add as much as \$3.75 for an operator-assisted collect call and as much as \$10 in additional charges on top of the per-minute rate.

Joel Haste, the deputy inspector general, said his office plans to review the Oncor contract to make sure procurement rules were followed in awarding it.

Gordon Kimble, Oncor's vice president for communications, declined in an interview before the cancellation letter was sent to discuss the city contract, saying it was "confidential." He would not explain why Oncor's rates were so much higher than Sprint's on the bills of three customers, but he said the company has a policy of adjusting charges from callers with complaints.

Companies such as Oncor sprang up after deregulation of the telephone industry in the 1980s. Kimble said customers are willing to pay more for the "convenience" of being able to use a pay phone.

The Sprint contract started in October 1990. Sprint was the only vendor considered because it already had won a competitive government contract, at an Army base. Sprint paid the city about \$335,000 in commissions over three years, according to a Sprint spokeswoman, including on calls from city jail phones starting in August 1992.

Paul Steel, head of the city's information resources office at the time, recommended that Sprint's contract be continued. He complained in a memo to Marshall on Jan. 4 that the attempt to increase revenue by switching vendors would be "achieved by additional charges to the inmates in the form of what amounts to be a tax." Steel also questioned "the validity of a sole source procurement where so many companies could compete in an open procurement."

Sprint and RC&A, a phone service company based in Clearwater, Fla., also complained about the switch, saying they weren't given a chance to bid on the business. RC&A's Anatola Cefail said her firm, which had provided service for Lorton pay phones since 1991, "would have paid the city \$1 million [a year] for the Lorton business alone." She said RC&A's revenue from Lorton was about \$6 million a year, but she wasn't paying the city any commission because her contract was with phone company GTE.

Many cities use a contract that Public Technology Inc., a nonprofit group affiliated with the National League of Cities, negotiated with AT&T. That contract calls for 22 percent commission for cities with more than 75 phones. Marshall said he could not pick AT&T at the time because of a legal technicality, but that obstacle has since been removed.

| ONCOR Communications Charges |                                     |  |              |        |       |      |     |  |
|------------------------------|-------------------------------------|--|--------------|--------|-------|------|-----|--|
| Amount                       | Place                               |  | Number       | Date   | Time  | Rate | Min |  |
| Oncor                        |                                     |  |              |        |       |      |     |  |
| Calling Card 703 683         |                                     |  |              |        |       |      |     |  |
| \$ 4.60                      | DIR ASST OH                         |  | 216 555-1212 | Jun 18 | 6:05P | SD   | 2   |  |
|                              | FR COLONIL VA                       |  | 804 224-     |        |       |      |     |  |
| 9.19                         | CLEVELAND OH                        |  | 216 696-     | 18     | 6:07P | SD   | 5   |  |
|                              | FR COLONIL VA                       |  | 804 224-     |        |       |      |     |  |
| 15.36                        | CLEVELAND OH                        |  | 216 696-     | 18     | 6:11P | SD   | 11  |  |
|                              | FR COLONIL VA                       |  | 804 224-     |        |       |      |     |  |
| \$ 29.15                     | Subtotal                            |  |              |        |       |      |     |  |
| \$ 29.15                     | Subtotal ONCOR Communications Calls |  |              |        |       |      |     |  |
| .87                          | Federal Tax                         |  |              |        |       |      |     |  |

## ONCOR Communications

\$ 30.02 Total ONCOR Communications

Billing Questions 1 800 864-2149

RATE KEY: D = Day rate  
S = Operator station-station

This portion of your bill is provided as a service to ONCOR Communications  
Toll charges are computed based on the rate schedule of ONCOR Communications

Jul 1 1994

| Zero Plus Dialing Charges |                                  |  |          |        |       |      |     |  |
|---------------------------|----------------------------------|--|----------|--------|-------|------|-----|--|
| Amount                    | Place                            |  | Number   | Date   | Time  | Rate | Min |  |
| Mid Atlantic Telecom      |                                  |  |          |        |       |      |     |  |
| Calling Card 703 683 7566 |                                  |  |          |        |       |      |     |  |
| \$ 3.14                   | WASHINGTON DC                    |  | 202 887- | Jun 10 | 5:26P | SE   | 1   |  |
|                           | FR REHOBOT DE                    |  | 302 227- |        |       |      |     |  |
| 3.14                      | WASHINGTON DC                    |  | 202 828- | 10     | 5:27P | SE   | 1   |  |
|                           | FR REHOBOT DE                    |  | 302 227- |        |       |      |     |  |
| \$ 6.28                   | Subtotal                         |  |          |        |       |      |     |  |
| \$ 6.28                   | Subtotal Zero Plus Dialing Calls |  |          |        |       |      |     |  |
| .19                       | Federal Tax                      |  |          |        |       |      |     |  |

\$ 6.47 Total Zero Plus Dialing

Billing Questions 1 800 456-7587



ACCT NUMBER 913 897  
JULY 29, 1994  
DETAIL OF CHARGES

PAGE 8

**SUMMARY OF CHARGES FOR INTEGRETEL**

|                             |             |
|-----------------------------|-------------|
| ITEMIZED CALLS (SEE DETAIL) | 9.55        |
| CHARGES BEFORE TAXES        | 9.55        |
| FEDERAL TAX                 | .29         |
| STATE AND LOCAL TAXES       | .00         |
| <b>TOTAL</b>                | <b>9.84</b> |

INTEGRETEL BILLING INQUIRIES 1-800-736-7500

**ITEMIZED CALLS FOR INTEGRETEL**

| NO                                | DATE | TIME | PLACE CALLED            | AREA | NUMBER | MIN   | AMOUNT |
|-----------------------------------|------|------|-------------------------|------|--------|-------|--------|
| BILLED ON BEHALF OF CALL CONCEPTS |      |      |                         |      |        |       |        |
| 1                                 | 7    | 8    | 752PM HAVELOCK NC       | 919  | 447    | DC 24 |        |
|                                   |      |      | CR CARD FROM LEBANON TN | 615  | 444    |       | 9.55   |

**TOTAL ITEMIZED CALLS FOR INTEGRETEL**

~~9.84~~

# - See Reverse

THANK YOU FOR PAYING BY MAIL



ACCT NUMBER 913 897  
JULY 29, 1994  
DETAIL OF CHARGES

PAGE 9

**SUMMARY OF CHARGES FOR ONCOR COMMUNICATIONS**

|                             |              |
|-----------------------------|--------------|
| ITEMIZED CALLS (SEE DETAIL) | 11.90        |
| CHARGES BEFORE TAXES        | 11.90        |
| FEDERAL TAX                 | .36          |
| STATE AND LOCAL TAXES       | .77          |
| <b>TOTAL</b>                | <b>13.03</b> |

ONCOR COMMUNICATIONS BILLING INQUIRIES 1-800-864-2149

**ITEMIZED CALLS FOR ONCOR COMMUNICATIONS**

| NO                        | DATE | TIME | PLACE CALLED              | AREA | NUMBER | MIN  | AMOUNT |
|---------------------------|------|------|---------------------------|------|--------|------|--------|
| BILLED ON BEHALF OF ONCOR |      |      |                           |      |        |      |        |
| 1                         | 7    | 22   | 208PM KANSASCITY KS       | 913  | 624    | DS 3 |        |
|                           |      |      | CR CARD FROM SWANSBORO NC | 919  | 393    |      | 11.90  |

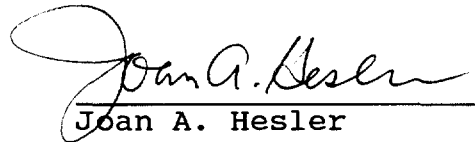
**TOTAL ITEMIZED CALLS FOR ONCOR COMMUNICATIONS**

# - See Reverse

THANK YOU FOR PAYING BY MAIL

**CERTIFICATE OF SERVICE**

I, Joan A. Hesler, hereby certify that on this 14th day of September, 1994, a true copy of the foregoing **REPLY COMMENTS OF SPRINT CORPORATION**, in the matter of Billed Party Preference for 0+ InterLATA Calls, CC Docket No. 92-77, was served U.S. First Class Mail, Postage Prepaid, or Hand Delivered, upon each of the parties listed below.

  
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